

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

ONE JET, INC.,

Debtor.

Case No. 18-24070-GLT
Chapter 7

Adversary No. 19-02134-GLT
Related Docs. Nos. 504, 507, 510, 536, and
540

WOODY PARTNERS, et al.,

Plaintiffs,

v.

MATTHEW R. MAGUIRE, PATRICK MAGUIRE,
BOUSTEAD SECURITIES, LLC, and MELVIN
PIRCHEKY,

Defendants.

Hearing Date and Time:
August 26, 2021 at 11:30 a.m.

Objection Deadline:
August 9, 2021

BOUSTEAD SECURITIES, LLC,

Movant,

v.

NO RESPONDENT.

**DEFENDANT BOUSTEAD SECURITIES, LLC'S MOTION
FOR LEAVE OF COURT TO EXCEED PAGE LIMITS**

Defendant Boustead Securities, LLC, by and through its undersigned counsel, respectfully presents this Motion for Leave of Court to Exceed Page Limits (this "Motion"), requesting for this Court to allow it to submit a brief in opposition to Plaintiffs' Motion for Leave to Amend Plaintiffs' Amended Complaint in excess of the page limits set forth in W.D.Pa.L.B.R. 7008-1(d), as follows:

1. On or about July 19, 2021, Plaintiffs filed their Motion for Leave to Amend Plaintiffs' Amended Complaint (Doc. No. 504) ("Plaintiffs' Motion").
2. Pursuant to the Court's Scheduling Order (Doc. No. 507), Defendant Boustead Securities, LLC's ("Boustead") opposition ("Boustead's Opposition") to Plaintiffs' Motion must be filed on or before August 9, 2021.
3. Under Bankr. W.D.Pa.L.B.R. 7008-1(d), "[b]riefs shall be limited to twenty (20) pages."
4. Boustead requests leave to file Boustead's Memorandum of Law in Opposition to Plaintiffs' Motion for Leave to Amend Plaintiffs' Amended Complaint (the "Memo of Law"), which consists of argument set forth on 28 total pages, which exceeds the 20-page limit set forth in Bankr. W.D.Pa.L.B.R. 7008-1(d), because the arguments set forth in Plaintiffs' Motion raise new and complex issues in their attempt for leave to assert a brand new claim against two (2) brand new parties in this case, and Boustead is unable to provide the factual background and is unable to articulate the legal arguments necessary to fully oppose Plaintiff's Motion within the 20-page limit.
5. For clarity and consistent with this Court's rules and procedures, Boustead will be forthwith filing the Memo of Law as a separate document on the cm/ecf system with a notation relating the Memo of Law back to this Motion.
6. These reasons constitute good cause justifying leave for Boustead to exceed the page limit set forth in Rule 7008-1(d).

WHEREFORE, Defendant Boustead Securities, LLC, respectfully requests that this Court enter an order authorizing it to file a Memorandum of Law in Opposition to Plaintiffs' Motion for Leave to Amend Plaintiffs' Amended Complaint in excess of the page limits set forth in Bankr. W.D.Pa.L.B.R. 7008-1(d), and to deem the proposed Memorandum of Law in Opposition to Plaintiffs' Motion for Leave to Amend filed separately with this Court admitted for consideration on the merits.

Dated: August 13, 2021

By: /s/ Jason L. Ott
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